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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 TECHNOLOGY & INTELLECTUAL
12 PROPERTY STRATEGIES GROUP PC, a
California Professional Corporation,

13 Plaintiff,

14 v.

15 BASIL P. FTHENAKIS, AN INDIVIDUAL,
16 CAMBRIDGE CM, INC., a California
Corporation, and DOES 1-10,

17 Defendants.
18

CASE NO. CV 11-02373 MEJ

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING DEADLINES AND
CONTINUING CASE MANAGEMENT
CONFERENCE**

Mag. Judge: Maria-Elena James

19 The parties, through their counsel respective counsel stipulate as follows:
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- 21 1. Plaintiff TECHNOLOGY & INTELLECTUAL PROPERTY STRATEGIES GROUP
PC filed its Complaint for copyright infringement, false advertising, conversion, breach of contract
22 and breach of fiduciary duty on May 13, 2011.
- 23 2. Defendant BASIL P. FTHENAKIS filed his Answer and Counterclaim on June 1, 2011.
24 Plaintiff and Counter-defendant TIPS GROUP filed a Motion to Dismiss on July 6, 2011, which
25 motion is scheduled for hearing on August 25, 2011 at 10:00 a.m. On that same day and time, this
26 matter is scheduled for an initial Case Management Conference.
- 27 3. The Parties have already filed their stipulation selecting Court sponsored mediation.
28

1 4. The Parties stipulate and request that this Court vacate the Case Management
2 Conference date and reschedule it for a date following the resolution of the Motion to Dismiss.

3 5. The Parties further stipulate and request that the deadline to file the Rule 26(f) Report,
4 complete initial disclosures and file the Case Management Statement shall be continued
5 accordingly.

6 6. The Parties further stipulate that all discovery be stayed pending further order of this
7 court.

8 Dated: August 4, 2011

By: /s/ William C. Milks III
William C. Milks III
Attorney for Plaintiff & Counter-defendant

10 Dated: August 4, 2011

By: /s/ Katherine S. Clark
Katherine S. Clark
Attorney for Defendant & Counterclaimant

12 [PROPOSED ORDER]

14 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the Initial Case
15 Management Conference scheduled for August 25, 2011, is hereby CONTINUED to 9/29/11 at 10am

16 ~~IT IS FURTHER ORDERED THAT the Court shall reschedule the Case Management~~
17 ~~Conference, if necessary, following resolution of Counter-defendant's pending motion to dismiss.~~

18 IT IS FURTHER ORDERED that the current deadlines to file the Rule 26(f) Report,
19 complete initial disclosures and file the Case Management Statement are adjusted accordingly.

21
22 IT IS SO ORDERED.

23 Dated: August 10, 2011

24 By: 
Maria-Elen James
25 US Magistrate Judge
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27
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